

**ORIGINAL**

*CC: JMW*  
 G. TODD WITHY (5975)  
 LAW OFFICES OF G. TODD WITHY  
 888 Mililani St., #700  
 Honolulu, HI., 96813  
 TEL.: (808) 521-2500  
 FAX: (808) 536-4474  
[withylawcourt@aol.com](mailto:withylawcourt@aol.com)

FILED IN THE  
 UNITED STATES DISTRICT COURT  
 DISTRICT OF HAWAII

APR 03 2007

at 1 o'clock and 07 min.  
 AM  
 SUE BEITIA, CLERK

MOISES A. AVILES (226569)  
 AVILES & ASSOCIATES  
 560 N. Arrowhead Av., #2A  
 San Bernardino, CA., 92404  
 TEL.: (909) 383-2333  
 FAX: (909) 383-9550  
[maviles1231@aol.com](mailto:maviles1231@aol.com)

Attorneys for Plaintiff  
 CHRISTOPHER GAHR

**UNITED STATES DISTRICT COURT,  
 DISTRICT OF HAWAI'I.**

LUCAS BRUNO III, CHRISTOPHER  
 GAHR, FRANK ROBERT PAULSON,  
 CHARLES TURNER, TOM YOUNG,

Plaintiffs,

v.

MICHAEL CHERTOFF, Secretary,  
 DEPARTMENT OF HOMELAND  
 SECURITY,

Defendant.

CIVIL NO. 03-00567-JM:BMK  
 VOIR DIRE.

Trial Date: Apr. 17, 2007.

Judge: The Hon. J. Michael Seabright

Voir Dire -Bruno v. Chertoff - 1

AVILES & ASSOCIATES  
 560 N. Arrowhead Av., #2A  
 San Bernardino, CA., 92404  
 TEL.: (909) 383-2333  
 FAX: (909) 383-9550  
[maviles1231@aol.com](mailto:maviles1231@aol.com)

///

///

///

///

NOTICE IS HEREBY GIVEN that Plaintiff presents the Proposed Voir Dire as follows:

“Have you worked for the Federal Government?

“Have you ever been terminated from your job?

“What was the reason why you were terminated from your job?

“Have any of you or your relatives been involved in a harassment or discrimination suit of any kind?

“Has your boss at your job insulted you in any way?

“Has your boss at your job racially insult you in any way?

“I have to apologize ladies and gentlemen, but has anybody used the following words to insult you: Nigger? Coon? Colored? Spade? Wetback? Mojado? Spic? Dago? Wop? Kike? Jap? Chink? Gook? Haole? Honkie? Cracker? Okie? White Trash?

“Were you or a relative or a friend ever sent to a concentration or detention camp by the United States or its enemies?

Voir Dire -Bruno v. Chertoff - 2

AVILES & ASSOCIATES  
560 N. Arrowhead Av., #2A  
San Bernardino, CA., 92404  
TEL.: (909) 383-2333  
FAX: (909) 383-9550  
maviles1231@aol.com

“Do you believe you were fired from your job because of race, sex, age, or any other condition not related to job performance?

“Do you believe you were denied a promotion because you have a different skin color or was born somewhere else, whether it be the Continental United States or elsewhere?

“Is there anybody here a present or former employee of Wackenhut Security?

“Is there anybody here a present or former employee of the Department of Homeland Security?

“Is there anybody here a present or former employee of the Federal Department of Justice?

“Is there anybody here a Native Hawaiian?

“Is there anybody here born in the State or Former Territory of Hawai’i?

“Is there anybody here that harbor deep resentment that the United States Government helped overthrow the Former Kingdom of Hawai’i in the mid-19<sup>th</sup> Century?

“Does anybody here harbor deep resentment the previous history by Caucasians who discriminated against Native Hawaiians and others when it was the Republic or Territory of Hawai’i?

“Do you or a relative belong to a racial supremacy group?

Voir Dire -Bruno v. Chertoff - 3

AVILES & ASSOCIATES  
560 N. Arrowhead Av., #2A  
San Bernardino, CA., 92404  
TEL.: (909) 383-2333  
FAX: (909) 383-9550  
maviles1231@aol.com

“Does anybody here belong to a movement to secede and reinstate the previous Kingdom of Hawai’i?”

“Have you or your relative advocated the overthrow of the United States Government?

“Do you believe that Native Hawaiians should be chosen first when applying for a job?

“Do you believe that people born in Hawai’i should be chosen first when applying for a job?

“Do you believe Caucasians should not be hired or promoted even though they may be more qualified for the job?

“Do you believe that a convicted felon should have a job screening passengers at airports?

///

Voir Dire -Bruno v. Chertoff - 4

AVILES & ASSOCIATES  
560 N. Arrowhead Av., #2A  
San Bernardino, CA., 92404  
TEL.: (909) 383-2333  
FAX: (909) 383-9550  
maviles1231@aol.com

"Would you be able to render a verdict in favor of a Caucasian when the act(s) were perpetrated by a 'Local Hawaiian'?"

Dated this 2<sup>nd</sup> day of April, 2007

By:

G. TODD WITHY  
(5975)  
LAW OFFICES OF G.  
TODD WITHY  
888 Mililani St., #700  
Honolulu, HI., 96813  
TEL.: (808) 521-2500  
FAX: (808) 536-4474  
withylawcourt@aol.com

Dated this 2<sup>nd</sup> day of April, 2007

By:

MOISES A. AVILES  
AVILES &  
ASSOCIATES  
560 N. Arrowhead Av.,  
#2A  
San Bernardino, CA.,  
92404  
TEL.: (909) 383-2333  
FAX: (909) 383-9550  
maviles1231@aol.com

**CERTIFICATE OF SERVICE.**

I HEREBY CERTIFY that, on the date and by method of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served by First Class mail and E-mail

Thomas A Helper 5676  
Assistant U. S. Attorney  
Room 6-100 PJKK federal Building  
300 Ala Moana Blvd  
Honolulu Hawai'i 96850-6100  
tom.helper@usdoj.gov

April 3, 2007 at San Bernardino, California

